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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

EMILIO JOSE HEREDIA COLLADO.

Defendant.

Case No. 21-cr-00109-CRB

**PARTIES' STIPULATION AND
PROPOSED ORDER FOR RELEASE
OF PASSPORTS TRAVEL TO
MEXICO**

Defendant Emilio Heredia having been sentenced on August 10, 2023, to a term of probation without a term of incarceration, the parties hereby stipulate that the Conditions of Release entered by the Court on March 23, 2021 (Dkt. No. 7) should be terminated and that defense counsel may release Mr. Heredia's U.S. and Mexican passports to Mr. Heredia without further limitation.

The parties further stipulate that during his term of probation Mr. Heredia may travel to Mexico with advance approval of his probation officer and without the necessity of an additional court order. This stipulation has been approved by U.S. Probation Officer Kristen Coleman.

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1 Dated: January 2, 2024

2 /s/ Ted W. Cassman
3 Ted W. Cassman
4 Counsel for Emilio Heredia

5 Dated: January 2, 2024

6 /s/ Matthew F. Sullivan
7 Matthew F. Sullivan
8 Trial Attorney
9 Criminal Division
U.S. Department of Justice

10 **PROPOSED ORDER**

11 Pursuant to the parties' stipulation and good cause appearing, it is hereby
12
13 ORDERED that defendant's Conditions of Release are hereby terminated and
14 that defense counsel may release Mr. Heredia's U.S. and Mexican passports to
15 Mr. Heredia without further limitation.

16 Dated: January __, 2024

17
18
19 Hon. Sallie Kim
20 U.S. Magistrate-Judge